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CONTRA COSTA COUNTY

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

RETIREE SUPPORT GROUP OF
CONTRA COSTA COUNTY,

Plaintiff,

v.

CONTRA COSTA COUNTY,

Defendant.

No. C12-00944 (JSW)

**JOINT STIPULATION REQUESTING
CONTINUANCE OF CASE
MANAGEMENT CONFERENCE,
WITH ~~[PROPOSED]~~ ORDER
(N.D. Local Rule 6-1(a))**

Defendant Contra Costa County (“County” or “Defendant”) and Plaintiff Retiree Support Group of Contra Costa County (“Plaintiff”) (together, "the Parties") are calendared to appear for

1 the Initial Case Management Conference ("CMC") on February 1, 2013;

2 WHEREAS, pursuant to the Court's Order of August 6, 2012 (Dkt. 37), the following
3 deadlines apply to the filing of the Second Amended Complaint, responsive pleadings and any
4 subsequent briefing schedule, including:

5 a. Plaintiff will file its amended complaint within sixty (60) days after completion
6 of the County's production or November 30, 2012;

7 c. Because of the holidays and possible furloughs, the County will file its
8 responsive pleading by January 9, 2013;

9 d. If the County files a motion to dismiss, Plaintiff's opposition brief will be filed
10 twenty-five (25) days after the County files the motion; and

11 e. The County's reply brief will be filed eleven (11) days after the filing of Plaintiff's
12 opposition brief;

13 WHEREAS, Plaintiff filed its Second Amended Complaint on November 30, 2012 (Dkt.
14 43);

15 WHEREAS, Defendant filed its Motion to Dismiss the Second Amended Complaint (the
16 "Motion to Dismiss") on January 9, 2012 (Dkt. 44-46);

17 WHEREAS, briefing on the Motion to Dismiss will not be complete until February 15,
18 2013 (Dkt. 37);

19 WHEREAS, the first available hearing date provided by the Court for hearing on the
20 Motion to Dismiss is March 29, 2013; and

21 WHEREAS, for reasons of judicial economy based on the deadlines set forth herein, there
22 is good cause for the Court to continue the Case Management Conference scheduled for February
23 1, 2013, until after the Motion to Dismiss the Second Amended Complaint is decided;

24 NOW THEREFORE, the Parties, by and through their respective counsel of record, hereby
25 stipulate and agree as follows, and respectfully ask the Court to enter the terms of this stipulation
26 as its Order, subject to amendment for good cause:

27 For reasons of judicial economy, the Parties agree the Case Management Conference
28 scheduled for February 1, 2013, should be continued to a date to be set by the Court after the

1 Motion to Dismiss is decided.

2 **IT IS SO STIPULATED AND REQUESTED BY** the Parties.

3 HANSON BRIDGETT LLP

4 DATED: January 17, 2013

5 By: /s/

6 RAYMOND F. LYNCH
7 Attorneys for Defendant
8 CONTRA COSTA COUNTY

9 DATED: January 17, 2013

10 LEWIS, FEINBERG, LEE, RENAKER &
11 JACKSON, P.C.

12 By: /s/

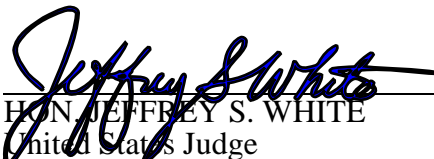
13 JEFFREY LEWIS
14 Attorneys for Plaintiff
15 RETIREE SUPPORT GROUP OF CONTRA
16 COSTA COUNTY

17 **ORDER**

18 **PURSUANT TO THE FOREGOING STIPULATION AND REQUEST**, and for good cause
19 shown, the Court resets the Case Management Conference to April 19, 2013.

20 **IT IS SO ORDERED.**

21 Dated: January 22, 2013

22 
23 HON. JEFFREY S. WHITE
24 United States Judge